

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Southern Division**

SNC-LAVALIN CONSTRUCTORS INC.	:	
Plaintiff,	:	
v.	:	Case Nos. 19-cv-00873-GJH
	:	19-cv-01083-PWG
TOKIO MARINE KILN INSURANCE LIMITED	:	
Defendant.	:	
	:	

MOTION TO CONSOLIDATE CASES

Plaintiff, SNC-Lavalin Constructors Inc. (“Plaintiff” or “SNC-Lavalin”), by and through its attorneys signed below, and pursuant to Federal Rule of Civil Procedure 42, moves to consolidate the above cases for the reasons stated in the accompanying Memorandum.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

- a. Grant this Motion to Consolidate Cases;
- b. Order that Cases 19-cv-00873-GJH and 19-cv-01083-PWG be consolidated for all purposes; and
- c. Enter such other and further relief as justice may require.

Respectfully submitted,

MCNAMEE, HOSEA, JERNIGAN, KIM,
GREENAN & LYNCH, P.A.

By: _____/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May, 2019, a copy of the forgoing Motion to Consolidate Cases and accompanying Memorandum was served via electronic filing on:

Robert L. Hebb
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_____/s/
Brent M. Ahalt